

Federal Defenders OF NEW YORK, INC.

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Southern District of New York
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December 15, 2021

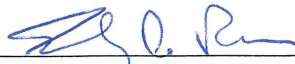
MEMO ENDORSED

BY EMAIL

Honorable Edgardo Ramos
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: United States v. Erik Ciriaco
21 CR. 450 (ER)

The application is X granted
_____ denied


Edgardo Ramos, U.S.D.J.
Dated: 12/15/2021
New York, New York

Dear Judge Ramos,

With the consent of the Pretrial Services Agency, I respectfully write on behalf of my client, Erik Ciriaco, to request that he be removed from home detention and placed on a curfew enforced by location monitoring. The Government defers to Pretrial. Mr. Ciriaco is fully compliant with his conditions of release. He is currently enrolled in substance abuse treatment, working as a security officer, and attending college at the Borough of Manhattan Community College. He has made tremendous progress on Pretrial release. Placement on a curfew instead of home detention would allow him to spend the little extra time that he has with family, especially during the holidays.

In addition, I write to request that Mr. Ciriaco be permitted to spend December 24 through December 26 in Trumbull, Connecticut with his fiancé's family. His fiancé, Jessica Urena, also serves as his third party custodian. Pretrial does not oppose his travel to the District of Connecticut but as a matter of policy opposes his overnight stay in Connecticut. The Government defers to Pretrial. I ask that the Court permit Mr. Ciriaco to remain in Trumbull, Connecticut overnight so as not to disrupt the Christmas holiday.

Mr. Ciriaco has been on home detention since initial bail conditions were set on May 12, 2021. He has not travelled outside of the District since May. I ask that given Mr. Ciriaco's compliance and the upcoming holidays he be placed on a curfew and permitted to travel and remain overnight in Trumbull, Connecticut, under the supervision of his third party custodian, Ms. Urena.

Respectfully submitted,
/s/
Zawadi Baharanyi
Assistant Federal Defender
917-612-2753

cc: Kaylan Lasky (ECF).